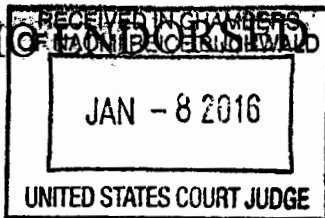


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Stephen J. Barrett
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January 6, 2016

VIA ECF and FACSIMILE (212-805-7927)

The Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

ENDORSEMENT

*This discovery schedule
is acceptable to The Court.*

Naomi Reice Buchwald,
USDC

January 11, 2016

Re: The Universal Church, Inc. v. Universal Life Church/ULC Monastery
Index No. : 14cv5213
Our File No. : 12743.00026

Dear Judge Buchwald:

Our office represents defendants Universal Life Church/ULC Monastery d/b/a The Universal Life Church, Universal Life Church Monastery Storehouse, George Freeman, Bruce Taylor, and Calvin Toellner in the above referenced matter. In follow up to the conversation held on the record before Your Honor on January 5, 2016 regarding outstanding discovery, we write jointly with Plaintiff's counsel to request an extension of the discovery deadlines in this matter pursuant to Your Honor's Individual Rules and Practices.

The current end date for fact discovery is January 15, 2016, and expert discovery is scheduled to be completed by February 29, 2016 with dispositive motions due no later than March 30, 2016. Initial party depositions have been completed. However, the parties are now pursuing additional nonparty depositions, thus necessitating an extension of time to complete these depositions. Multiple experts may also be retained by both sides, and expert discovery may therefore require more than the previously allotted 30 days.

Accordingly, the parties request that the end date for fact discovery be extended to February 29, 2016. The parties also request that the end date for expert discovery be extended until 60 days following the conclusion of fact discovery, with an expert discovery end date of

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April 29, 2016. The deadline for both sides to exchange expert reports will be March 18, 2016, and the deadline to complete all expert depositions will be April 29, 2016.

The parties further request approximately 45 days following the close of expert discovery to file dispositive motions and a Joint Pretrial Order. This additional time beyond the 30 day deadline contemplated by Your Honor's Individual Rules is requested in light of the likely necessity of including reference to expert testimony in these filings, and all expert deposition transcripts may not be immediately available on the end date for expert discovery. Therefore, the parties request that the deadline for filing dispositive motions and Joint Pretrial Orders be set for June 17, 2016.

This is the parties' second request for an extension of the discovery deadlines, and all parties have consented to the proposed extension. In light of the foregoing, the parties respectfully request that the Court extend the discovery deadlines in this action in conformity with the proposed schedule set forth above.

Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker LLP

A handwritten signature in black ink, appearing to read 'S. Barrett', with a checkmark to the right.

Stephen J. Barrett

cc: Via ECF Only

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